

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. No. 11479  
WILLIAM CARRICO  
3 State Bar No. 003042  
Assistant Federal Public Defender  
4 411 E. Bonneville Avenue, Suite 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
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7 Attorneys for Anousone Savanh  
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9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 \* \* \*

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 ANOUSONE SAVANH,

16 Defendant.  
17

2:14-cr-290-KJD-PAL

**STIPULATION TO MODIFY  
CONDITIONS OF PRETRIAL RELEASE  
(CR #7) TO PERMIT EXPANDED  
TRAVEL AND CONTACTS**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United  
19 States Attorney, and Allison Herr, Special Assistant United States Attorney, counsel for the United  
20 States of America, and Rene L. Valladares, Federal Public Defender, and William Carrico, Assistant  
21 Federal Public Defender, counsel for defendant ANOUSONE SAVANH that his conditions of  
22 Pretrial Release be modified to allow Mr. Savanh to travel and have family contacts.

23 This Stipulation is entered into for the following reasons:

24 1. On March 31, 2014, the Defendant, Anousone Savanh appeared before the Court,  
25 which set certain conditions of release. Those conditions were the subject of a hearing on November  
26 18, 2015. Following that hearing, Mr. Savanh was continued on the same conditions.

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1           2.       The Parties have recently conferred regarding the amendment and modifications to  
2 the conditions of release. It is now mutually agreed to by the Parties that they request the Court  
3 relax, and amend, the pretrial release conditions now effect as follows:

4           A. That Mr. Anousone Savanh be permitted to travel from May 21- through May 25, 2015  
5 to Southern California for the purposes of attending a family function.

6           B. That Mr. Savanh be permitted to host his sister and brother-in-law during their visit to  
7 Las Vegas, Nevada on June 11, 2015.

8           C. That Mr. Savanh and his family be permitted to host Mr. Savanh's niece and her children  
9 for the period of one week beginning on June 18, 2015.

10          3.       The Parties are prepared to recommend these modifications to the Court's restrictions  
11 on Mr. Savanh, not only because of his substantial compliance with the currently imposed  
12 conditions, but also due to the fact that newly discovered evidence appears to substantially mitigate  
13 the extent of the conduct of which he is accused.

14           DATED this 18<sup>th</sup> day of May, 2015.

15           RENE L. VALLADARES  
16           Federal Public Defender

DANIEL G. BOGDEN  
United States of America

17           /s/ William Carrico

/s/ Allison Herr

18 By: \_\_\_\_\_  
19 WILLIAM CARRICO  
20 Assistant Federal Public Defender  
21 Counsel for Defendant

22 By: \_\_\_\_\_  
23 ALLISON HERR  
24 Special Assistant United States Attorney  
25 Counsel for the Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:14-cr-290-KJD-PAL

Plaintiff,

vs.

FINDINGS OF FACT, CONCLUSIONS OF  
LAW, AND ORDER

ANOUSONE SAVANH,

Defendant.

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On March 31, 2014, the Defendant, Anousone Savanh appeared before the Court, which set certain conditions of release. Those conditions were the subject of a hearing on November 18, 2015. Following that hearing, Mr. Savanh was continued on the same conditions.

2. The Parties have recently conferred regarding the amendment and modifications to the conditions of release. It is now mutually agreed to by the Parties that they request the Court relax, and amend, the pretrial release conditions now effect as follows:

A. That Mr. Anousone Savanh be permitted to travel from May 21- through May 25, 2015 to Southern California for the purposes of attending a family function.

B. That Mr. Savanh be permitted to host his sister and brother-in-law during their visit to Las Vegas, Nevada on June 11, 2015.

C. That Mr. Savanh and his family be permitted to host Mr. Savanh's niece and her children for the period of one week beginning on June 18, 2015.

3. The Parties are prepared to recommend these modifications to the Court's restrictions on Mr. Savanh, not only because of his substantial compliance with the currently imposed

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1 conditions, but also due to the fact that newly discovered evidence appears to substantially mitigate  
2 the extent of the conduct of which he is accused.

3 **ORDER**

4 IT IS FURTHER ORDERED that Mr. Savanh's conditions of Pretrial Release be modified  
5 to allow travel and family contact.

6  
7 5/19/2015

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UNITED STATES MAGISTRATE JUDGE